



RCE  
PATENT  
39003.816US01

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application of:  
Gregory A. PICCIONELLI

Group Art Unit: 2614

Examiner: Q. Nguyen

Serial No. 10/822,212

Filed: April 9, 2004

For: VIDEO PRODUCTION WITH  
SELECTABLE CAMERA ANGLES

REQUEST FOR CONTINUED EXAMINATION  
UNDER 37 CFR 1.114

Mail Stop RCE  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Sir:

In further response to the Office Action of March 30, 2009, and in response to the Advisory Action of September 18, 2009, applicant hereby requests continued examination of claims 1-4. Applicant hereby repeats the arguments submitted with the previous response dated August 31, 2009, and offers the following additional remarks.

In the Advisory Action, the PTO is heard to state that “[a]pplicant mainly argues that the secondary reference Roberts does not appear to disclose the use of a processor for a smooth transitional view between at least two of a plurality of cameras.” The PTO first points out that, according to Roberts, “the use of a processor is necessary in response to user’s selection or input (see paragraph [0007] and throughout the patent application.)” As indicated in the previous response (e.g., on page 2), applicant agrees that Roberts teaches the use of a CPU, i.e., a processor. However, the PTO then proceeds to state that “each camera [of Roberts] represents a different camera angle unless one camera positions on top of the other camera. If a target/object moves from one camera to another camera, the angle would change even though both cameras sit right next to each other. The only time the camera angle do[es] not change [is] if one camera sits on top of the other camera.” By virtue of this teaching, the PTO thus appears to urge that Roberts does disclose generation of a continuous change of camera angle.

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With respect, applicant submits that Roberts is not properly so construed. Applicant does not dispute that Roberts disclose multiple cameras, and thus multiple camera angles. But the mere fact that multiple camera angles are disclosed does not *ipso facto* constitute a disclosure or suggestion of a *continuous* change of camera angle between any two of Roberts' cameras. A transition between two fields of view, as disclosed by Roberts, is not necessarily a continuous transition having a continuous change of camera angle. Applicant respectfully urges that the Roberts system is more properly understood as producing a hand-off between two cameras, allowing for continuous *tracking* of the same target but not inherently creating a smooth, i.e., continuous *change of camera angle* during the transition. An abrupt, discontinuous change of camera angle is clearly possible, and indeed appears to be the more likely and expected result in view of the apparent absence of an explicit statement by Roberts that the change in camera angle, as well as the tracking of the target, is a smooth, continuous operation.

Applicant therefore reiterates, with respect, that the combined teachings of the cited references do not appear to suggest to one of ordinary skill the subject matter of any of the present claims, and thus fail as §103 teachings. Withdrawal of the rejection on this basis is earnestly solicited.

In view of the foregoing remarks, it is submitted that all present claims are in condition for allowance. Should the Examiner have any questions, he is invited to contact the undersigned at the telephone number indicated.

Respectfully submitted,

  
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Michael M. Gerardi  
Reg. No. 33,698

September 30, 2009  
Date

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